

# Statement of Work Oversight of PRP Removal Action

ROGERS ELECTRIC COMPANY SITE CHEVERLY, MARYLAND

Dynamac Corp. WA # CO3112

#### INTRODUCTION

Pursuant to the provisions of a <u>administrative</u> Order (copy provided) under Section 106 of CERCLA issued by the U.S. EPA on May 4, 1992, a removal action will be conducted by the Potentially Responsible Parties (PRPs) at the <u>Rogers Electric Co.</u> Site. The <u>Rogers Electric Site</u> is located at \_\_\_\_\_\_ in Cheverly, Maryland.

The primary objective of the Order is to require the Respondents to undertake and complete removal activities at the Site to abate an imminent and substantial endangerment to the public health and welfare or the environment arising from the release of hazardous substances at the Site. The U.S. EPA will act in an oversight capacity during these removal activities.

Described below are preliminary details about the Site background, as well as the general requirements for the technical assistance which will be required of the oversight contractor for this project.

#### BACKGROUND

The <u>Rogers Electric Co.</u> (the "Site") is located at
, in Cheverly, Maryland
County,  The Site was first discovered in March of 1988 by the Maryland  Department of Environment (MDE) after an inspection was made.  Their findings during the inspection included detecting the
presence of transformers and oil-filled electrical equipment
bearing PCB name/plates. The items had reportedly been on-site for over 5 years. In January of 1991, a response to a report of leaking machinery concluded that the PCB transformers were leaking PCB-contaminated oil onto a gravel area located on site. This work assignment will serve to analyze PRP efforts pursuant to the administrative order for removal issued by the EPA. An analysis of PRP compliance with the order and incorporated plans and schedules is required under this SOW.



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#### SCOPE OF WORK

# TASK 1 - OVERSIGHT OF PRP CONDUCT OF THE REMOVAL

The contractor is requested to provide qualified personnel in order to provide cost efficient oversight of the PRP's conduct of the removal action. Contractor personnel are requested from an office located in or within economic commuting distance of this area for the entire period covered by this work assignment. The required frequency of Site visits will be determined by EPA's Project Coordinator and may be, but not limited to, 8 hours per day for up to 2 days per week for the period that the Respondent's technical contractors will be on the Site performing work necessary to execute removal tasks as defined in the Work Plan. Prior to actual on-site presence, (as determined by the schedule provided in the PRP Work Plan), the contractor will release to EPA for approval, the name and the background of such personnel.



In order to provide the contractor with the opportunity to review any pertinent information, the EPA Project Coordinator will make available copies of any documents listed in the Administrative Record Index if requested, as well as the Quality Assurance, Sampling, and Health and Safety Plans submitted by PRPs. The contractor will meet with the EPA Project Coordinator briefed on the provisions of the Order.

Areas that will be reviewed to insure compliance with the Order include the field performance of various removal tasks. These tasks include, in general:

- Interim site safety measures;
- Site clean-up;
- Follow-up sampling;
- 4. Administrative requirements.

The contractor will keep a daily log of the PRP's activities, and will submit a copy of this log to EPA on a weekly basis. The field log may be supplemented with photographic documentation of significant activities performed by the PRPs. The field log, and the photographs, should be annotated such that the representative photographs can be located. If, in the opinion of the contractor staff person in charge, a serious discrepancy exists between the procedures outlined in the approve PRP Work Plan and their execution of a given task, the contractor will provide verbal notification to the EPA Project Coordinator immediately. Additionally, any accidents or on-site emergencies will be reported immediately to the EPA PC.

The contractor will conduct field oversight to determine whether all procedures in the approved PRP Work Plan are being followed. In evaluating the removal effort, the contractor will observe compliance with such activities as:

- a. Noting what type of information is being retained by Respondent's contractor in the daily activities;
- b. Noting that all on-site soils, and other waste materials are handled in compliance with all applicable regulations and the provisions contained within the approved PRP Work Plan;
- c. Obtaining copies of all manifests for wastes transported off-site;
- d. Noting whether all Site safety measures are being followed in accordance with the provisions of the Order and the Health and Safety Plan;



- e. Noting whether sampling points utilized by Respondent's contractor for follow-up sampling is in keeping with those projected by the Work Plan;
- f. Noting whether sampling equipment is cleaned in an appropriate fashion between sampling events;
- g. Noting that sampling containers and equipment are appropriate for analysis of interest, and whether appropriate sampling procedures, as will be defined in the approved PRP Quality assurance Project Plan, are being followed.
- h. Accept custody of split samples from all PRP sampling and have them analyzed per OSC's instructions.

At a minimum, the contractor will adhere to the levels of protection which will be established in the Health and Safety Plan for on-site personnel. Contractor personnel reserve the right to adhere to a higher level of protection if they deem this necessary. The contractor's representatives should have received safety training and be enrolled in a medical monitoring program.

#### EVALUATE DATA

All data collected by the Respondents will be evaluated to determine if it was collected properly and/or adequately represents its intended purpose.

## REPORTING VARIANCES FROM APPROVED PLAN & EMERGENCIES

Any accidents or on-site emergencies will be reported immediately to the EPA PC. also, any significant delays or problems which arise during sampling or any actions taken in variance to the work plan will be reported directly to the EPA PC.

## OBSERVE AND REPORT FIELD DECISIONS

Any decisions made by the Respondents to alter the procedures established by the Health and Safety Plan and final schedule due to circumstances encountered in the field will be reported to the EPA PC.

#### TASK 2- TECHNICAL REVIEW OF DOCUMENTS

U.S. EPA may request that additional technical items be reviewed which are not covered under a specific task.

#### TASK 3 - DELIVERABLES

The Deliverables required on this assignment are as follows:



- Weekly summary activities (field log) during oversight of the implementation of the selected removal alternative;
- Applicable technical document review;
- 3. Weekly (at a minimum) telephone status reports to the EPA PC as appropriate by the person in charge of field oversight, including discussion of progress made and problems encountered with suggested solutions;
- 4. Final reports of field work during the removal action with appropriate photo and graphic documentation of the PRP's conduct of the removal.
- One copy of the monthly TES Work Assignment Status Report.

## TRAVEL REQUIREMENTS

Travel which includes air fares and hotel costs will make field oversight on this project prohibitively expensive and the contractor is requested to take all measures necessary to minimize such expenses. Personnel located in or within economic commuting distance from the area are requested to minimize such travel. The contractor should prepare to be mobilized beginning in <u>June</u>, or upon approval of work plan, and maintain a full-time presence at the Site.

# LEVEL OF EFFORT AND SCHEDULE

# LEVEL OF EFFORT

It is assumed that the above tasks will require at least 45 calendar days to complete, with a final PRP Report due 60 days thereafter. The estimate of LOE hours required for this project is approximately 180-200 hours beginning ASAP, and continuing through the submission of the final PRP Report. Modifications to the Work Assignment may be recommended based upon information obtained during Site activities or due to unanticipated conditions which may arise during the course of the removal action.

### DELIVERABLES

- Copies of summaries during oversight under Task 1 shall be mailed by the last day of the work week to the PC at the address listed below.
- Notification of variance shall be discussed with the PC by phone as soon as possible.



- 3. Final reports will be sent to the PC within forty-five (45) days of the completion of the removal action.
- TES Monthly Status Report shall be mailed by the twentieth (20th) day of the following month.

## CONTACTS

The current contacts for the project are listed below:

Kurt Wassersug on behalf of Karen Wolper Project Coordinator U.S. EPA, Region III 841 Chestnut Building Philadelphia, Pennsylvania 19107 (215) 597-9800